

REMARKS

Claim 3 has been canceled. Claims 1-2 and 4-19 remain pending in the present application.

Applicant acknowledges with appreciation the Examiner's finding that claims 6, 12-14, and 16-19 contain allowable subject matter. Applicant respectfully submits that base claim 1 is patentable over the references cited against it, as demonstrated below. Accordingly, Applicant requests that the Examiner allow claims 6, 12-14, and 16-19.

Claims 1-2, 4-5, 7-11, and 15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,355,362 to Gorshe et al. in view of U.S. Patent No. 4,740,963 to Eckley. Applicant respectfully traverses the rejection.

The Examiner relied upon the description in Gorshe et al. of a digital loop subscriber carrier ("DLC") remote digital terminal ("RDT") reformatting DS1 TR-008 data into TR-303 for connection to a central office as alleged disclosure of the claimed interface conversion. The Examiner acknowledged that Gorshe et al. do not disclose the features of the claimed demultiplexing unit and relied upon Eckley as a combining reference that allegedly teaches these features. Applicant respectfully submits that it would not have been obvious to one skilled in the art at the time the claimed invention was made to combine Gorshe et al. and Eckley in the manner proposed by the Examiner. For example, the reformatting described in the cited portions of Gorshe et al. is only directed to DS1 and higher-rate services. Col. 4, line 61 et seq. of Gorshe et al. And the cited portions of Eckley only describe a demultiplexor 49 for separating an 8-bit parallel signal into the particular bits in each byte that represents the respective voice signal, medium speed digital signal, and low speed digital data signal. Col. 6, lines 9-11 of Eckley. The

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Examiner, therefore, failed to establish a prima facie case of obviousness by failing to cite any suggestion or motivation in either reference to combine the reformatting of DS1 and higher-rate services described in Gorshe et al. with the 8-bit demultiplexor 49 described in Eckley, as proposed by the Examiner. The provided motivation demonstrates nothing beyond improper hindsight from the claimed invention in piecing together the disparate features described in the respective references. Indeed, the references teach away from the Examiner's proposed manner of combination. Eckley describes a remote DLC 19 that "multiplexes together the combined voice and digital data signals supplied to it on lines 21a-21n from the various remote user units 11a-11n and transmits these multiplexed signals over a common DS1 line 23 to the central office." Col. 3, lines 63-68 of Eckley. In other words, both references describe using DS1 at the remote unit for connection to the central office.

Thus, even assuming, arguendo, that it would have been obvious to one skilled in the art to combine the references, the combination would, at most, have suggested multiplexing signals to DS1 by DLC 19, as described in Eckley, and reformatting the DS1 signal into TR-303 for connection to the central office, as described in Gorshe et al.

In other words, Gorshe et al. and Eckley, as cited and relied upon by the Examiner, would have failed to disclose or suggest,

"[a] gateway digital loop carrier device comprising:
an integrated access device side terminating unit
terminating a transmission signal sent from an integrated access
device accommodating as a subscriber at least one of a telephone, a
modem and ISDN and implementing a TR-008 interface;
a demultiplexing unit demultiplexing the terminated
transmission signal into DS0 signals;
a unit performing interface conversion of the demultiplexed
DS0 signal from TR-008 to TR-303 or GR-303; and
a TR/GR-303RDT unit based on TR-303 or GR-303 and
having a plurality of subscriber ports for sending the interface-

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converted DS0 signal to a switch implementing a TR-303 or GR-303 interface," as recited in claim 1. (Emphasis added)

Accordingly, Applicants respectfully submit that claim 1, together with claims 2, 4-5, 7-11, and 15 dependent therefrom, is patentable over Gorshe et al. and Eckley, separately and in combination, for at least the foregoing reasons.

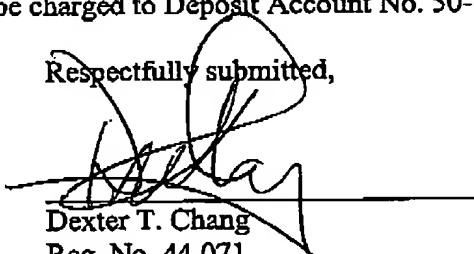
The above statements on the disclosures in the cited references represent the present opinions of the undersigned attorney. The Examiner is respectfully requested to specifically indicate those portions of the respective reference that provide the basis for a view contrary to any of the above-stated opinions.

Applicant appreciates the Examiner's implicit finding that the additional reference made of record, but not applied, does not render the claims of the present application unpatentable, whether this reference is considered alone or in combination with others.

In view of the remarks set forth above, this application is in condition for allowance which action is respectfully requested. However, if for any reason the Examiner should consider this application not to be in condition for allowance, the Examiner is respectfully requested to telephone the undersigned attorney at the number listed below prior to issuing a further Action.

Any fee due with this paper may be charged to Deposit Account No. 50-1290.

Respectfully submitted,



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